

Call for Sites Submission: Supporting Statement

Land East of Oakley Road, Bromham

August 2020

Issue

Final

Statement prepared by

TN

Reviewed by

RG

Date Issued

14/08/2020

Prepared by

Woods Hardwick Planning Ltd
15-17 Goldington Road
Bedford
MK40 3NH

On behalf of

Landcrest Developments Ltd

Job reference

3391

Contact

planning@woodshardwick.com
woodshardwick.com
(01234) 268862

Contents

1	Introduction	1
2	Site Description	2
3	Bedford Borough Local Plan Review	4
4	Case for the Proposed Site	6



Page Deliberately Blank.

1 Introduction

- 1.1 The purpose of this statement, prepared on behalf of Landcrest Developments Ltd, is to set out the justification for this site for allocation in the Bedford Borough Local Plan Review. It demonstrates that in weighing up the site's technical and other material considerations, it should be included as an allocated site for residential development in the forthcoming Local Plan Review (LPR).
- 1.2 Comprised of an irregular parcel agricultural land, the site measures 3.76 ha in size and lies on the north eastern fringe of Bromham adjacent to existing dwellings along the eastern side of Oakley Road.
- 1.3 The proposed site has a detailed planning history in the form of previous applications and this, alongside the matters dealt with under those applications are discussed in further detail in Section 4 of this Statement.
- 1.4 This Statement is accompanied by an illustrative layout which further demonstrates development of the site would be in general conformity with the NPPF and its objectives and will deliver sustainable development to include both open market and affordable housing.
- 1.5 The following Section sets out a more detailed site description, Section 3 puts the site in the context of the LPR and Section 4 outlines the case for allocation. Separate submissions will be made by Landcrest Developments Ltd on parallel LPR Issues and Options consultation.

2 Site Description

- 2.1 The site lies to the eastern side of Oakley Road, on the northern edge of Bromham and approximately 4 miles from the centre of Bedford. Bromham is identified as a Key Service Centre in Bedford Borough Council's adopted Development Plan and given its size is likely to retain this status in the Local Plan Review. It provides a very good level of facilities and service provision, meaning it is capable of accommodating growth in a sustainable manner
- 2.2 The site itself is agricultural land and comprises an area of around 3.76ha. An Agricultural Land Classification Survey (ALCS) was submitted with the previous applications, detailing this site contains 1.7ha of grade 3b land, 0.3ha of grade 3a land, and 1.6ha of grade 2 land. Overall, the site is comprised of a maximum 1.9ha of Best and Most Versatile (BMV) agricultural land. Given the abundance of such land in Bedford Borough it is likely that the Council will be reliant upon developing BMV land if it is to meet its development requirements.
- 2.3 The western boundary of the site fronts Oakley Road and is bound by a mature hedgerow. On the opposite side of Oakley Road there are open fields that also adjoin the edge of Bromham and extend westwards into the countryside beyond.
- 2.4 To the south of the site lies existing residential development and the main built up area of Bromham. Here the site directly adjoins the residential curtilages of the existing dwellings in Oakley Road. The eastern boundary of the site is bound by mature hedgerow, beyond this the land is agricultural, however there are visible buildings within the landscape that are associated with New Park Farm complex and further commercial and agricultural buildings in Lower Farm Road
- 2.5 An Overhead Electricity Line (OEL) bisects the site in an east to west direction with a single transmission tower at the centre of the site, which is proposed to be grounded.
- 2.6 In the wider context the north and east of the site comprises a series of irregular arable fields parcels, beyond this lies the Great River Ouse, the village of Oakley, the Midland mainline railway and the A6 dual carriageway. To the west lies arable field parcels, a bridleway and further westwards the John Bunyan Trail, a long-distance walk. The application site and the surrounding area falls within the Landscape Character Area (LCA) classification 3B: Oakley - Great Ouse Limestone Valley. The site does not have any other landscape designations.
- 2.7 Bromham itself is a large village, strategically located south of the nearby A6 and adjoins the A428 on its southern boundary. The village, therefore, maintains strong transport links

via public highways and sustainable transport methods enabling access to towns of Bedford, Northampton, Milton Keynes, Luton and Wellingborough. All five have excellent rail connections to London, the south east, Birmingham, Nottingham and the north east.

- 2.8 As a Key Service Centre, the village has a diverse mix of facilities and services including: a Budgens supermarket, a Lower School, village hall, library, two small convenience stores, a post office, Doctors surgery, pharmacy, hot food takeaways, playing fields, public houses (serving food), Bromham Mill and Bromham Park.
- 2.9 The Bedford and Kempston urban area has an excellent diverse mix of facilities and services including: multiple supermarkets and superstores, schools for children of all ages, community centres, libraries, post offices, Doctors surgeries, an infirmary, pharmacies, hot food takeaways, playing fields, public houses (serving food), and a range of open playing spaces accessible to the public.

3 Bedford Borough Local Plan Review

- 3.1 Bedford Borough Council has commenced work on a formal review of their recently adopted Bedford Local Plan 2030. This is a formal policy requirement within the adopted plan, Policy 1 requiring the review to commence by 15th January 2021 and a plan to be submitted for examination by 15th January 2023.
- 3.2 The Issues & Options Consultation Paper states that policies within the adopted plan that make provision for growth need to be updated. The review is necessary so that the Council can respond to longer term growth requirements, and in particular the Oxford to Cambridge Arc, as soon as possible.
- 3.3 The Review may also need to take into account the imminent changes to the current planning system as set out in the recently published White Paper *Changes to the Current Planning System* depending on the speed in which changes come into force and the nature of any transitional arrangements. Whilst currently undergoing consultation, it is evident that the objectives and aspirations make clear that a significant uplift to the current housebuilding rates in the UK are sought. This is to be facilitated by a proposed revision to the Standard Methodology used to inform Local Housing Need referred in the NPPF 2019.
- 3.4 This new approach equates to an approximate national housebuilding target of 337,000 dwellings per year which is markedly higher than what is being delivered at present at 187,000. Affordability will remain a key component as an adjustment factor for the SM indicating that significant new housing is intended to be delivered in areas with affordability issues.
- 3.3 Furthermore, the review is necessary to monitor the speed with which new development would be brought forward in coming years and progress made by local communities with neighbourhood plans, which the adopted plan relies upon to identify housing sites. The early review gives the Borough the opportunity to intervene, if necessary, to maintain house building rates in accordance with new local and national targets aforementioned.
- 3.5 The Council accepts that in determining housing need for the area, there are no exceptional circumstances that exist to deviate away from using the standard method for calculating housing need. There is also currently no indication from neighbouring authorities that they require Bedford to accommodate any of their unmet need.
- 3.6 Using the newly proposed standard method approach Bedford has a housing need of 1,153 dwellings per annum, meaning that if the plan runs to 2040 the total housing need will be

23,060 over a 20-year plan period. This figure can change over time as updates are published on affordability rates.

- 3.7 Taking account of existing commitments of around 11,000 dwellings, the plan will need to allocate 12,000 new homes to 2040. A new strategy is needed to deliver this growth and it is stated that it may be the case that the local plan strategy combines elements from more than one of potential options.

4 Case for the Proposed Site

4.1 This section sets out the specific considerations that demonstrate the site's suitability as a potential option for allocation under the Review. It includes commentary on the site's previous consideration through the LP2030 following the last Call for Sites history which accentuates the appropriateness of the site's location within Oakley, together with detailed technical considerations that set out the site is indeed developable and deliverable.

Call for Sites

4.2 It is important to reflect on the recent history of this site in the context of the preparation of the recently adopted development plan. The proposed site falls within an area of land that was submitted to and assessed under the Call for Sites submission in preparation for the recently adopted local plan. The site reference is Site 553.

4.3 The site had been viewed relatively positively by the Council in the preparation of the recently adopted local plan. In 2017 the Council published its 2017 Consultation Paper, from which emerged the strategy of directing substantive growth to Key Service Centres, of which Bromham is one.

4.4 For the Key Service Centres, the Consultation Paper listed preferred options for accommodating growth of 500 dwellings. The Consultation Paper was also supported by documents titled 'Site Assessments and Potential Options for Allocations' (SAPOA) and 'Strategic Housing & Employment Land Availability Assessment' (SHELA), both dated April 2017.

4.5 The SAPOA assessment of Site 553 notes the site is within an accessible location and would contribute towards the housing land supply by providing a mix of owner occupied, affordable rent and shared ownership properties. There were no significant objections from a highways perspective and no landscape issues were raised.

4.6 The site was not considered to be suitable as an allocation in the local plan at that time as alone it would not deliver the wider strategy of providing land for a new school, however the development could have contributed towards the provision of a school in combination with other sites or contribute towards the extension of the existing school..

4.7 Ultimately as the Local Plan progressed to the next stage, the Council took the policy decision to devolve the allocation of sites within Key Service Centres and villages to Neighbourhood Plans. This does not divert from the conclusion that the site was considered as part of one of the potential options for allocation.

Bromham as a Sustainable Location

- 4.8 Following the policy decision of the Council, the site was further considered as an option for potential allocation within the draft Bromham Neighbourhood Plan (BNP). BNP has progressed since that time and has been through and passed its examination and is now awaiting referendum, although this is not expected to take place until May 2021 in line with the Local Government and Police and Crime Commissioner (Coronavirus) Postponement of Elections and Referendums) (England and Wales) Regulations 2020.
- 4.9 The BNP has not included this site as an allocation, with the 3 allocations instead being situated in the southwest of the village at Beauchamp Park (minimum of 390 homes), Stagsden Rise (minimum of 80 homes) and Old Stable Yard Development (maximum of 30 homes). The former two have since had planning applications submitted to the Council, with Stagden Rise receiving a resolution from the Planning Committee for planning permission.
- 4.10 Given the above, and in the context of the Local Plan Review, imminent changes to the planning system and aspirations for the Oxford-Cambridge Arc, growth in the Borough is expected to accelerate in the region, Bromham is likely to facilitate further growth in the near future beyond the currently allocated 500 homes on the basis that it is one of the most sustainable locations for rural growth in the Borough.
- 4.11 The Council's Settlement Hierarchy Background Paper, published during the preparation of the now adopted plan, details the provision of facilities and services of 89 rural settlements, gathered by the rural Parish Councils, to determine locations for development in the context of sustainability.
- 4.12 Key services and facilities such as: a bus service to a town centre, permanent post office, a primary or lower school, general store, and a GP or other health centre all score 8 points each, the highest awarded to any service of facility under the selected methodology.
- 4.13 It is noted it is not the quantity of facilities and services that grants settlement a higher score, but the widest range of provision. By that same token, however, it is considered that if a settlement is able to provide a diverse mix of facilities and services it clearly maintains, both, a healthy and competitive local economy and a thriving population which enhances the vitality of the settlement. The only exception to this is the number of shops found within a settlement, where provision of more than six scores a settlement a maximum of 8 points for this category.
- 4.14 Of the 89 settlements listed within this document, Bromham scores highest in five out of six different iterations of the settlement hierarchy (Tables 2 and 4-7). These different iterations take into account different hierarchies that would manifest if some facilities and services, such as GPs or school capacity, were not factored in. The one iteration

where Bromham does not rank first is found in Table 3 where settlements that can operate together are grouped up where this would make geographical sense; it nonetheless scores second in this iteration.

- 4.15 It is evident that there is no more sustainable location for growth = in the rural area of Bedford Borough than Bromham. This is the same position that is held by the Council as this evidence base has informed allocations in Policy 3S of the currently adopted Local Plan.
- 4.16 The site itself will be well-related to existing development along Oakley Road as it will immediately adjoin existing residential development. It is also well-related to the wider settlement of Bromham.

Planning History

- 4.17 An outline application (Ref: 17/02753/MAO) for the erection of 80 dwellings on this site was submitted in October 2017. The application was refused under the Council's powers of delegation on 29th January 2018, with the decision notice dated 5th February citing 10 reasons for refusal.
- 4.18 A revised outline application (Ref: 18/02671/MAO) was submitted in October 2018 which sought to address the reasons for refusal in the prior application. This was not determined by the Council within the statutory timeframe. Subsequently, an appeal (Ref: APP/K0235/W/19/3240091) was lodged with the Planning Inspectorate and, as is required in a non-determination appeal, the Council proceeded to assess the application to identify what decision would have been made had they determined the application.
- 4.19 On 25th November 2019 Members of the Planning Committee resolved that they would have **approved** the application in line with the recommendation of approval from the Planning Officer. There were no objections raised in the Officer's Report on technical matters based upon the final versions of plans and documents, to include a revised access and illustrative layout, submitted during the course of the application which overcame the previous scheme's 10 reasons for refusal.
- 4.20 The Council, subsequently changed its position following the adoption of the Local Plan 2030, arguing that this was a material change in circumstance. Its case to the appeal included site specific matters that were not raised as a concern at the time it made the resolution to grant planning permission, including in relation to sustainability and impact on character, which are discussed in greater detail below, and it is considered that they were introduced primarily to help bolster the case against the site at the appeal in order to help protect the Council's then recently adopted Local Plan. After all, an acceptable site does not suddenly become unacceptable simply because the Council's claimed position

on its 5 year housing land supply changes from shortfall to surplus.

- 4.21 In performing an about-face on the application for whatever reason, the Council had very little reason to protest against any grant of planning permission for the proposed site. Consequently, it chose to question the sustainability credentials of the site, together with its possible deliverability.
- 4.22 For the avoidance of all doubt, details on the site's sustainability credentials and its deliverability are tackled further within this section.
- 4.23 The appeal decision has since been quashed following a successful legal challenge due to the Inspector's failure to give adequate reasoning for his conclusions on key matters of relevance in the appeal, particular housing land supply. It therefore no longer has any materiality to the site.
- 4.24 Ultimately, the appeal remains in the process of redetermination by the Planning Inspectorate following the quashed decision.
- 4.25 The substantial supporting technical information that accompanied the applications and the appeal have demonstrated its suitability for development, and it is considered that the site is developable and deliverable. Thus, it is an ideal site for an allocation. As a matter of fact, very few other sites will be able to demonstrate the suitability and viability of a site for development to the extent this site can on the basis of all the supporting documents produced from inception, through to submission, resubmission and appeal.
- 4.26 The contention that the development plan met the needs of the area according to the Council, and as such there being no need to bring forward further development despite Bromham being identified as a very suitable location for growth and there being no objections from the Council's officers on technical matters, therefore is and remains questionable. This is particularly so when viewed in the context of the likely increase of the Council's local housing need figure and the need to meet the Government objective of significantly boosting the supply of homes which in itself can only be achieved once the *minimum* targets, that is the LHN, have already been met.
- 4.27 In any case, now that every nature of this review seeks to address the further arising need due to policy on a local and national level, the site can be considered a primary contender for allocation. Its evidence base for supporting residential development in technical terms is comprehensive and non-controversial to the Council as set out in the Planning History of the site.
- 4.28 Reference should first be made to the updated illustrative layout for the proposed site.

This primarily includes a reduction in overall building footprint to enhance biodiversity net gain, open space, and replication of the existing morphology of residential dwellings within the village achieved by including more detached and semi-detached dwellings together with removal of rear projections.

- 4.29 Landscaping has also further been enhanced to better reflect the edge-of-settlement locations and urban fringe identity, and continues to accentuate the ecological and biodiversity gains achievable on site, especially in the rear gardens of properties. Whilst these above changes are subtle in nature, it can be appreciated that a scheme can be achieved that is exceptionally receptive and sensitive to its location to assist in a seamless transition to the wider countryside beyond the site's boundaries.
- 4.30 The aforementioned evidence base includes a Transport Statement and Green Travel Plan which was considered suitable by the Highways Authority at the planning stage and it was accepted that a development of 80 dwellings is unlikely to have a significant traffic impact.
- 4.31 Nonetheless, the plans upon which these are based also suitably incorporate pedestrian and sustainable transportation infrastructure as set out within the Green Travel Plan. Within the site 2m footways will be provided, which will tie into the existing provision on Oakley Road to the south of the site. Walking will be fully promoted by the TPC and relevant maps and route information will be included within the Residential Travel Information Pack.
- 4.32 Cycle-based measures include promotion of a Bicycle Users' Group - which will allow cyclists (and potential cyclists) to meet and discuss the best routes to and around the site and any problems that they may encounter; and information on the local cycle network routes showing the safest and most convenient routes in and around Bromham and to Bedford will be provided.
- 4.33 Furthermore, the site is in accordance with the guidelines for sustainable transport contained within *Manual for Streets*, *Manual for Streets 2*, *Guidelines for Providing for Journeys on Foot*, and *Inclusive Mobility*.
- 4.34 The above documents note that walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes (up to 800m), but that is by no means an upper limit. Although, *GPJF* does identify a preferred maximum walking distance for journeys on foot at 2km. It is noted that many key facilities and services are situated within a 2km radius of the site.
- 4.35 The Green Travel Plan gives these specific distances to local facilities and also notes that the nearest bus stop to the site is located approximately 350m to the south of the

proposed site access on Oakley Road and therefore a maximum of 650m from the furthest point on the site.

- 4.36 This bus stop is served by three services, two of which are community transport group services that are highly intermittent and generally ‘book to pick up’ services. The community bus service is provided by the local authority so that the elderly can access local amenities. An additional bus stop providing services to the wider region is located approximately 900m from the site and is therefore within a 14 minute walk.
- 4.37 On the matter of deliverability, the key factor to which the Council considered to be an issue was that of the OEL bisecting the site and how quickly and practically this could be achieved to enable first delivery within five years of receiving planning permission.
- 4.38 Whilst the matter short-term deliverability is not, and never should be, an inherent reason for questions whether a site is suitable or viable, efforts have made in any event to sufficiently address these matters for the Council’s benefit and assurance. Discussions with UK Power Networks have been continuous and remain ongoing with respect to the undergrounding of the OEL cables to facilitate the development in accordance with the proposed layout.
- 4.39 In consultation with UKPN, it has been confirmed that the scheme for undergrounding OEL cables would be fully delivered within 18-24 months from the initial instruction to proceed with design of the installation. It is feasible that the design and legal formalities for the undergrounding be carried out in tandem with the preparation, submission and approval of a reserve matters application. The on-site preliminaries and construction of new dwellings would commence following discharge of pre-commencement conditions in the usual way and the undergrounding cabling works co-ordinated into that program.
- 4.40 There is no reason for there to be undue delay to the delivery of new housing. It is clear from the above that not only is Bromham a sustainable settlement for growth, but so too is the site *within* Bromham. This is prior to any consideration and agreements given to further infrastructure that would invariably have to support the projected levels of growth as part of the review and, more specifically, that would enable future growth within Bromham itself.

Sustainable Development

- 4.41 A number of benefits are associated with the scheme that are mutually supportive and, when taken together, contribute to the three overarching objectives of sustainable development of which there is a presumption in favour as established in Paragraph 11(d) of the National Planning Policy Framework. The balancing exercise required by the NPPF should therefore determine whether there are adverse impacts that would significantly and demonstrably outweigh the benefits.

- 4.42 With respect to the economic benefits of the proposed scheme, the development is well located in close proximity of existing facilities and services essential for day-to-day needs. Development would encourage use of these facilities and service, thereby supporting local businesses. Additionally, the construction period would make a very notable contribution to this industry via the creation of jobs and demand. In the long term, the Council Tax that will be collected will also make important contributions in enhancing the social, economic, environmental conditions of the area.
- 4.43 Social benefits that arise as a result include affordable housing contribution together with mix of housing provided to address local housing need in Clapham and the wider area for small households. Any provision of open market housing, then, should be given significant weight in the context of Paragraph 59 of the NPPF as it is a substantial social benefit with very little, if any, social disbenefits produced by the scheme. The design of the site would be in accordance with the *Secured by Design* principles to enhance safety and mitigate opportunities and potential for crime and anti-social behaviour.
- 4.44 Insofar as the environmental benefits are concerned, the site would incorporate green infrastructure and enhances permeability in addressing the need for sustainable urban drainage systems. Exceptional connectivity with the wider urban promotes healthier and more active lifestyles within the community. The wider picture of the scheme would then present an opportunity for net biodiversity gains as a result of the proposals and changes which enhance the immediate and wider environmental landscape.
- 4.45 Summarily, this Statement demonstrates that the site would make an appropriate residential development site to meet identified needs in a sustainable location. Furthermore, the site is readily deliverable and Landcrest Developments are more than willing to work with the Council in terms of providing any detailed information to support an allocation.



Woods Hardwick

Architecture | Engineering | Planning | Surveying

BEDFORD : HEAD OFFICE

15-17 Goldington Road
Bedford MK40 3NH
T: +44 (0) 1234 268862

BIRMINGHAM

Fort Dunlop, Fort Parkway
Birmingham B24 9FE
T: +44 (0) 0121 6297784

ONLINE

mail@woodshardwick.com
woodshardwick.com